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1 A. Actually, it's Carrie Strohl.
2 Q. Carrie Strohl. And, again, she,
3 apparently, made the recommendation, although
4 there's not a record of it, and you authorized
5 it.
6 MR. WAHL: Is there a question?
7 MR. ROBERTS: That was the
8 question.
9 A. Actually, in that case, it appears
10 that I actually documented the SOAP note.
11 Q. So, you're the one that,
12 ultimately, made the decision in the third
13 appeal stage?
14 A. Yes.
15 Q. And then, in the third appeal
16 stage, you and Brian Fuller made the decision
17 to get, to deny the appeal?
18 A. The third appeal wasn't a denial.
19 Q. Right. It was approved, and it was
20 approved on the same medical information on
21 which you denied the second appeal. Right?
22 A. There's a couple things I want to
23 clarify.
24 First of all, on the third appeal,
25 Brian Fuller and I didn't make a decision one

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1 have been approved and they're not subject to
2 further review, they just get their disability
3 check every month?
4 A. No.
5 Q. That doesn't exist?
6 A. No.
7 Q. So, if a guy's in a coma and has
8 been there for seven years, he's got to prove
9 he's disabled every month. Is that the case?
10 MR. WAHL: Objection.
11 A. In order to receive long-term
12 disability benefits, there are the requirements
13 to prove to disability.
14 Q. So, in a situation where you have
15 somebody in a coma, has been in a coma for
16 years, has no likelihood of coming out of the
17 coma, do you have them examined every mon
18 have the attending physician's statement sent
19 to the company every month?
20 A. We require periodic proof of
21 disability. If you want a specific answer, no,
22 we don't require an attending physician's
23 statement every month, but we, certainly, do
24 require periodic proof of disability.
25 Q. How periodic, in that situation,

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1 way or another. That decision was made by our
2 appeals committee.
3 Q. Which consisted, at the time, of
4 Marcia Murray, who was involved early in the
5 case --
6 MR. WAHL: Objection to.
7 Q. -- Jen Nichols, who was involved in
8 denying the first appeal?
9 A. And Tara Warshawer.
10 Q. What's Tara Warshawer's position at
11 that time?
12 MR. WAHL: At which time?
13 MR. ROBERTS: The time of December
14 27, 2001 when this decision was made to approve
15 the third appeal.
16 A. I believe she was a team manager.
17 Q. Are there claims that Prudential
18 has approved that are on auto pay?
19 A. I'm not sure what you mean.
20 Q. You've never heard the phrase auto
21 pay?
22 A. I've heard the phrase auto pay,
23 never in connection with a long-term disability
24 claim.
25 Q. Oh, really. Are there claims that

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1 would you require proof of disability?
2 A. I can't recall that we have any
3 such situation. But, at a minimum, we would
4 require proof of disability, at least once
5 every two years.
6 Q. Are there any claims you have on
7 which it's a once every two years scenario?
8 A. Yes.
9 Q. Are there any claims you have where
10 it's a longer period of time than that?
11 A. No.
12 Q. Are there claims that you approved
13 for a period of five years or more where you
14 require monthly proof of disability?
15 MR. WAHL: Objection.
16 A. I'm not sure I understand your
17 question.
18 Q. Are there claims where the claimant
19 has been receiving benefits for a period equal
20 to or greater than five years, where you still
21 require monthly proof of disability?
22 A. There could be.
23 Q. Are there any that you can think
24 of?
25 A. Yes.